

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

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Innovative Sports Management, Inc. d/b/a Integrated  
Sports Media,

Plaintiff,

versus

Civil Action No.  
1:23-CV-00332-AMD-SJB

JESSENIA BURGOS, Individually, and as  
officer, director, shareholder and/or principal of  
BARU CORP d/b/a RIKO PERUVIAN,

and

BARU CORP d/b/a RIKO PERUVIAN,

Defendants.  
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**NOTICE OF MOTION FOR DEFAULT JUDGMENT**

Plaintiff, INNOVATIVE SPORTS MANAGEMENT, INC. (“Innovative” or “Plaintiff”),  
by and through its undersigned counsel, hereby moves this Court for Default Judgment against all  
defendants for failing to plead or otherwise appear in the above action. This motion shall be heard  
on June 20, 2023, or as soon thereafter as counsel may be heard. In making this application,  
Plaintiff relies on:

1. Plaintiff’s Motion for Default Judgment, with Exhibits A-C, Plaintiff’s Affidavit in  
Support, Attorney Affirmation in Support of Costs, and all other pleadings heretofore  
had in this proceeding,

**INTEGRATED SPORTS MANAGEMENT**

By: /s/Alexander Lonstein

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Alexander Lonstein, ESQ.  
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*Our File No. ISM22-16NY-02*